

James Brown

From: Gerry Thompson [gat@alaskancopper.com]
Sent: Wednesday, October 26, 2011 12:41 PM
To: jim brown
Subject: Fw: Request for Additional Information

Jim,

I just received this e-mail today.

Jerry

From: Davis.Tony@epamail.epa.gov
Sent: Wednesday, October 26, 2011 9:23 AM
To: GAT@alaskancopper.com
Subject: Fw: Request for Additional Information

October 24, 2011

Gerald Thompson
Environmental Assistant
Alaskan Copper and Brass Company
Alaskan Copper Works
628 South Hanford
Seattle, WA 98134-2123

RE: EPCRA 313 Inspection of 10/4/2011 - Request for Additional Information

Via E-mail

Dear Mr. Thompson,

Thank you for the index of MSDS forms that are maintained by Alaskan Copper Works and Alaskan Copper and Brass Company. We have reviewed the information that you supplied and found that we need addition information.

We have separated the requests for information for Alaskan Copper Works and Alaskan Copper and Brass Company since we were informed at the time of inspection that they were separate entities.

The evaluation of the MSDS list and inspection of October 4, 2011 found that Lead, Copper, Nickel, Chromium, Methanol, Ethylene Glycol, and Nitric Acid may have been manufactured, processed or otherwise used in amounts above the reporting thresholds established by EPCRA Section 313. For manufacturing and processing the threshold amount is 25,000 pound per year. For otherwise use the annual reporting threshold is 10,000 pounds. The exception to these general rules is Lead which has a reporting threshold of 100 pounds per year. Please note that EPA requires that the total weight of the chemicals used must be reported.

Please send us copies of the MSDS for the chemicals listed in the two tables below. The tables are specific to the company listed in the first row. Also please list, for the past five years on an annual basis, the amounts of these chemicals that have been manufactured, processed, or otherwise used.

The MSDS and chemicals for Alaskan Copper Works that we require additional information on are:

Alaskan Copper Works MSDS Reference Number	Common name listed on the MSDS index
B-0008	Ethylene Glycol
B-013	Startex Antifreeze
B-056	Methanol
B-166	Texaco Antifreeze
C-035	Aluminum W/Lead
C-039a	Aluminum Alloy
C-039b	Aluminum Alloy
C-039c	Aluminum Alloy
C-039d	Aluminum Alloy
C-039d	Aluminum Alloy
C-067	Aluminum W/Nickel
C-068	Aluminum W ?Nickel and Chromium KDS-5
C-069	Aluminum W/Chromium
C-072	Aluminum/Copper
C-078	Aluminum/Lead
C-081	Aluminum Brass, Arsenical
C-086	Alcad and Cladding Products
C-087	Alcad and Cladding Products
C-088	Alcad and Cladding Products
C-097	Aluminum Alloy
D-005	Leaded Steel, Hot or Cold Rolled
D-006	Carbon and Leaded Steel, HR, A36, 10X
D-008	Alloy Steel, HR & CR leaded steel 4130, 4140
D-011	Carbon and Alloy Steel, 10 XX, 93XX
D-080	Chrome Plated Carbon Steel
D-092	Nickel Alloy (Sandvik)
D-093	Steel Alloys All Grade S
E-004	Phosphorus Deoxidized Copper
E005	Copper Nickel 90/10
E006	Copper Nickel Alloys
E007	Everdur, High Silicon Bronze 655
E-008	Yekkiw Brass, 65-35 270
E-009	Leaded Copper, Deoxidized
E-011	Copper Based Products
E-017	Arsenical Admiralty
E-018	Evedur, Silicon Bronze
E-019	Beryllium Copper Casting Alloy
E-020	Beryllium Copper Wrought Alloy
E-024	Copper, Brass and Bronze
E-028	Marcon Bronze Alloy
E-030	Lead Coated Copper Sheets Copper
E-031	Red Brass, Gliding, Cart, Brass/Zinc

E-032	Copper Products
E-033	Copper Nickel, 90/10 and 70/30 706 and 715
E-042	Copper Alloys, Outokumpu 1100 through 1200
E-052	Copper, Sheet Plate
E-054	Copper, Cold and Hot Rolled
E-055	Copper Alloys Oxygen Free CDA 102
E-056	Copper Alloys, Phosphorus Dioxide CDA
E-507	Commercial Bronze 90% CDA 220
E-058	Red Brass 85%
E-059	Low Brass 80% CDA 240
E-061	Yellow Brass 63% CDA 270
E-602	Low Lead Brass Tube CDA 330
E-603	Brass Alloys CDA 330-332
E-604	Trumper Metal CDA 435
E-065	Inhibited Admiralty CDA 443
E-068	Copper Alloys Tin Bronze
E-069	Copper Alloys Leaded-Tin Bronze
E-070	Brass Sheet and Strip
E-071	Bronze Sheet and Strip
E-072	Copper Sheet and Strip
E-073	Nickel Silver Sheet and Strip
E-076	Copper Alloys 335,340,342,35
E-077	Copper Alloys 101,103, 122, 11
E-079	Copper Alloys 143
E-080	Copper Alloys 210, 220, 226, 23
E-081	Copper Alloys 360, 365, 380
E-082	Copper Alloys 510, 511
E-083	Aluminum Bronze 613, 614
E-084	Copper Alloys 681
E-085	Copper Alloys 706, 710, 715,71
E-086	Copper Alloys 752, 774
E-087	Copper Alloys 210, 220, 230, 24
E-088	Naval Brass 464
E-094	Copper Alloys 1XXthru 7XX
E-102	Beryllium Copper 170, 172, 173, 17
E-110	Copper Alloy 952, 953, 954, 95
E-111	Cadmium Copper RWMA Class 1
E-112	Copper 110
E-113	Chrome Copper RWMA Class 2
E-114	Beryllium Free Copper RWMA Class 3
E-116	Beryllium Copper RWMA Class 4
E-117	Zirconium Copper Alloy 910
E-118	Copper Tungsten
E-120	Brass/Bronze Rods, Copper Alloy 220 thru 879

E-137	Brass Alloys 220, 230, 260
E-138	Brass Cuivre Juane
E-139	Copper Base Alloys
E-140	Oxygen Free Copper 101, 102 1021
E-141	Binary Brass Copper-Zinc
E-143	Bronze Silicon, Lead
E-144	Copper Alloys
E-145	Chase Blue Dot Rod C36,000
E-146	Brass Rod 200, 300, 400
E-148	Copper Alloys 1XXX Series
E-149	Copper Nickel Alloys 7XXX Series
E-150	Copper Alloys 101, 102, 103
E-151	Inhibited (Arsenical) Admiralty 443
E-152	Cupro Nickel 706, 715
E-153	Brass rod and Brass Wire C 335, C340
E-154	Brass Alloy, Copper Zinc Alloys 2XXX Series
E-155	Carbon, low-high alloy steel products
E-156	Brass/Bronze Rod, Parts, and Wire 22000, 26000
E158	Fusible Alloys Low Melt A
E-159	Electrolytic Tough Pitch Copper ASTM All
E-160	Copper-Aluminum Allows Cast Bars
E-161	Copper Alloys Cast Bars, C
E-162a	Copper/Nickel Based Alloys 90/10 Cupro
E-162b	Copper /Nickel Based Alloys 70/30 Cupro
F-013	Nickel Based Alloy Castings
F-014	Beryllium Nickel Alloys 440, 41C, 41
F-021	Nickel and Nickel Alloys C-276, C60
F-022	Nickel Based Alloy Steel 200, 400, 60
F-030	Nickel and Nickel Alloys c-276, 600
F-032	Nickel Steel Sheet, Plate
F-033	Nickelvac F75 & L605 Cobalt Bas
F-034	Allvac, nickelvac, Allcorr Nickel Bas
F-035	Nickel Base Alloys Metal Tubing
F-047	Nickel Base Allows
F-048	Copper Nickel 7/30 90/10
F-049	Inco Nickel Alloys 200-290, 30
F-050	Inco Alloys HX, G, C-276, 904L
F-052	Inconel Alloys
F-053	High Cobalt Steel Castings
F-054	Nickel Based Cast Steel
F-064	Corrosion Resistant Alloys C100b, N1
F-069a	Nickel Based Alloy Metal Nickel 20
F-069b	Nickel Based Alloy Metal Mondel 40
F-069c	Nickel Based Alloy Metal Inconel 60

F-069d	Nickel based Alloy Metal Incoloy 80
F-71	Nickel Alloys TW Metals
F-72	Brass and Copper Alloys TW Metals
G-005	Specialty Stainless Steel Wire, Rod
G-010	Stainless Steel All Grades
G-010a	Stainless Steel All Grades
G-011	Stainless Steel 300 & 400
G-017	Stainless Steel 300 & 400
G-018	Stainless Steel All Grades
G-021	Stainless Steel 300 & 400
G-022	Stainless Steel All Grades
G-023	Stainless Steel 316, 321, 30
G-026	Stainless Steel Sheet, Plate
G-027	Stainless Steel Sheet, Plate
G-029	Stainless Steel and Nickel Alloys 300 & 800
G-030	Stainless Steel 300 & 400
G-032	Austenitic, Ferritic, Stainless Steel
G-037	Stainless Steel
G-032	Alloy and Stainless Steel
G-043	Stainless Steel
G-044	Stainless and Special High Alloy Steel
G-045	Stainless Steel
G-046	Stainless Steel
G-047	Stainless Steel
G-049	Stainless Steel
G-055	Stainless Steel
G-060	Stainless Steel
G-061	Stainless Steel
G-062	Stainless Steel
G-063	Stainless Steel
G-064	Steel and Aluminum
G065	Stainless Steel
G-068	Stainless Steel
G-071	Stainless Steel
G-073	Stainless Steel
I-019	Inorganic Lead Compounds
K-019	Weld Electrodes, Copper Alloy
K-20	Weld Wire, Copper Alloy
K-021	Weld Filler Metal, Inco, Alloy
K-023	Solder, Tin Antimony
K-024	Sold, Tin Lead
K-044	Weld Filler Metal, Nickel
K-047	Silver, Copper, Phosphorous Alloy
K-051	Weld Electrode Chromium

K-067	Nickel and Nickel Alloy Bare Welding Wire
K-081	Silvaloy 50 Brazing Alloy
K-082	Stay Silv White and Black Braz
K-083	Saftey-Silv 56
K-087	Welding Electrodes High Nickel
K-112	Avesta CR-NI and Alloy Bare Wire
K-114	Handy and Harmon White Flux, Silver Brazing
K-115	Engelhard Ultra Flux Silver Brazing
P-011	Nickel Sulfate

The MSDS and chemicals for Alaskan Copper and Brass Company that we require additional information for are:

Alaskan Copper and Brass MSDS Reference Number	Common name listed on the MSDS index
G-042	Alloy and Stainless Steel
D-008	Alloy Steel, HR & CR Leaded Steel
F-034	Allvac, Nickelvacc, Allcorr
C-069	Aluminum/Chromium
E-083	Aluminum/Bronze
C-039e	Aluminum Alloy
C-039d	Aluminum Alloy
C-039c	Aluminum Alloy
C-039b	Aluminum Alloy
C-039a	Aluminum Alloy
C-097	Aluminum Alloys
C-081	Aluminum Brass, Arsenical
C-072	Aluminum W/Copper
C-035	Aluminum W/Lead
C-078	Aluminum W/Lead
C-067	Aluminum W/Nickel
C-068	Aluminum W/Nickel and Chromium
E-017	Arsenical Admiralty
G-032	Austenitic, Ferritic Stainless Steel
K-112	Avesta CR-NI Bare Wire
E-102	Beryllium Copper
E-019	Beryllium Copper Casting Alloys
E-116	Beryllium Copper RWMA Class 4
E-020	Beryllium Copper Wrought Alloys
E-114	Beryllium Free Copper RWMA Class
E-014	Beryllium Nickel Alloys
E-141	Binary Brass
E-138	Brass
E-154	Brass Alloy, Copper Zinc Alloys

E-137	Brass Alloys
E-063	Brass Alloys
F-72	Brass and Copper Alloys
E-146	Brass Rod
E-153	Brass Rod and Brass Wire
E-070	Brass Sheet and Strip
E-156	Brass/Bronze Rod, Parts and Wire
E-120	Brass/Bronze Rods, Copper Alloys
J-411	Brite Zinc Aerosol
E-143	Bronze
E-071	Bronze Sheet and Strip
E-111	Cadmium Copper RWMA Class 1
D-006	Carbon and Leaded Carbon Steel
E-113	Chrome Copper RWMA class 2
D-080	Chrome Plated Carbon Steel
E-057	Commercial Bronze 90%
E-112	Copper 11
E-054	Copper Cold
E-052	Copper Sheet
E-079	Copper Alloys 143
E-094	Copper Alloys 1XX
E-080	Copper Alloys 210
E-087	Copper Alloys 210
E-081	Copper Alloys 360
E-082	Copper Alloys 510
E-084	Copper Alloys 681
E-085	Copper Alloys 706
E-086	Copper Alloys 752
E-110	Copper Alloy 952
E-144	Copper Alloys
E-150	Copper Alloys
E-148	Copper Alloys
E-161	Copper Alloys
E-069	Copper Alloys
E-068	Copper Alloys
E-077	Copper Alloys
E-076	Copper Alloys
E-042	Copper Alloys, Outkumpu
E-055	Copper Alloys, Oxygen Free
E-056	Copper Alloys, Phosphorous
E-139	Copper Based Alloys
E-011	Copper Based Products
E-006	Copper Nickel Alloys
E-005	Copper Nickel 90/10

E-033	Copper Nickel, 90/10 and 70/30
F-048	Copper Nickel
E-149	Copper Nickel Alloys
E-032	Copper Products
E-072	Copper Sheet and Strip
E-118	Copper Tungsten
E-024	Copper, Brass and Bronze
E-162b	Copper/Nickel Based Alloys
E-162a	Copper/Nickel Based Alloys
E-160	Copper-Aluminum Alloys
E-152	Cupro Nickel
B-008	Ethylene Glycol
F-053	High Colbalt Steel Castings
F-050	Inco Alloys
F-049	Inco Nickel Alloys
K-086	Incoly Alloys
F-052	Inconel Alloys
E-151	Inhibited (Arsenical) Admiralty
E-065	Inhibited Admiralty
I-019	Inorganic Lead Compounds
E-030	Lead Coated Copper Sheets
E-009	Leaded Copper Deoxidized
D-005	Leaded Steel, Hot or Cold Rolled
E-062	Low Lead Brass Tube
E-028	Marcon, Bronze Alloy
B-056	Methanol
E-088	Naval Brass
E-030	Nickel and Nickeel Alloys
F-021	Nickel and Nickel Alloys
D-092	Nickel Alloy (Sandvik)
F-71	Nickel Alloys
F-067	Nickel and Nickel Based Alloy Bare Welding
F-047	Nickel Based Alloys
F-035	Nickel Based Alloys
F-022	Nickel Based Alloy Steel
F-013	Nickel Based Alloy Casting
F-069d	Nickel Based Alloy Metal
F-069c	Nickel Based Alloy Metal
F-069b	Nickel Based Alloy Metal
F-069a	Nickel Based Alloy Metal
F-054	Nickel Based Cast Steel
E-073	Nickel Silver Sheet and Strip
F-032	Nickel Steel
P-011	Nickel Sulfate

F-033	Nickelvac F75 and L605
B-007	Nitric Acid, 67%
E-004	Phosphorus Deoxidized Copper
E-058	Red Brass 85%
E-031	Red Brass, Gliding Cart. Brass Corp
K-081	Silvaloy 50 Brazing Alloy
K-047	Silver-Copper-Phosphorus Alloy
K-024	Solder, Tin, Lead
K-023	Solder, Tin Antimony
G-005	Specialty, Stainless Steel
G-073	Stainless Steel
G-043	Stainless Steel
G-030	Stainless Steel
G-021	Stainless Steel
G-017	Stainless Steel
G-011	Stainless Steel
G-049	Stainless Steel
G-055	Stainless Steel
G-023	Stainless Steel
G-063	Stainless Steel
G-061	Stainless Steel
G-010a	Stainless Steel
G-022	Stainless Steel
G-018	Stainless Steel
G-010	Stainless Steel
G-047	Stainless Steel
G-060	Stainless Steel
G-062	Stainless Steel
G-045	Stainless Steel
G-046	Stainless Steel
G-027	Stainless Steel
G-026	Stainless Steel
G-037	Stainless Steel
G-068	Stainless Steel
G-065	Stainless Steel
G-029	Stainless Steel & Nickel Alloy
G-071	Stainless Steel Alloys
G-044	Stainless & Specialty High Alloy Steel
D-093	Steel Alloys
K-051	Weld Electrode, Chrome
K-019	Weld Electrode, Copper
K-021	Weld Filler Metal Inco Alloy
K-044	Weld Filler Metal, Nickel
K-020	Weld Wire, Copper Alloy

K-087	Welding Electrodes, High Nickel
E-008	Yekkiw Brass
E-061	Yellow Brass 63%
E-117	Zirconium Copper Alloy

Please note that the two sets of MSDS index sheets that we received were not labeled. Our examination led us to believe that the lists of chemicals above were applied correctly to the companies but if they are not then the lists could be easily switched back. The common names of the chemicals were copied as presented on the MSDS lists to the best of abilities.

Also an examination of EPA guidance for reporting to EPCRA 313 could not find any reference to the procedure mentioned by Mr. Jim Brown that limited reporting amounts of chemicals to the area around the welds of products manufactured. Would it be possible for you to examine documents within the two companies to determine how this practice evolved? If you find guidance that speaks to this practice we would appreciate a copy.

If you have questions or comments please feel free to contact me by phone at (206) 553-8322, by e-mail at davis.tony@epa.gov, or in writing to the address listed below.

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